AFFIDAVIT OF SPECIAL AGENT JANET CONNOLLY IN SUPPORT OF AN APPLICATION FOR A COMPLAINT

I, Janet Connolly, Special Agent with the Department of Homeland Security, Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- I am a Special Agent with United States Department of Homeland Security ("DHS"), Immigrations and Customs Enforcement, Homeland Security Investigations ("HSI"), and am assigned to the office of the Special Agent in Charge, Boston, MA. I have been an agent of HSI since 2008. As part of my duties, I am authorized to investigate violations of the laws of the United States, including criminal violations relating to child exploitation, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, 2252, and 2252A. I have received training in the investigation of child pornography, child exploitation, and transportation of minors, and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256).
- 2. This affidavit is submitted in support of a criminal complaint charging WALTER JOHNSON, YOB 1948, of Framingham, Massachusetts, with one count of distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).
- The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses, including, in particular, HSI agents in Providence, Rhode Island and the Rhode Island State Police ("RISP") Internet Crimes Against Children ("ICAC") Taskforce. Because this affidavit is submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included each and every fact known to me concerning this

investigation. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

STATEMENT OF PROBABLE CAUSE

- 4. In January 2017, HSI Providence and the RISP ICAC Task Force began an investigation of a subject in Attleboro, Massachusetts ("the Attleboro subject") regarding a Craigslist advertisement he posted, titled "
- 5. As part of that investigation, investigators obtained records from an internet service provider related to the Attleboro subject's email account and were able to locate graphic sexual conversations between the subject and others about having sex with minors as well as soliciting others to send child pornography.
- 6. In their review of the chat communications, RISP found that on January 21, 2017, at 8:49

 AM, the Attleboro subject communicated with a person using an anonymized craigslist email address, hbt74-5963068473@pers.craigslist.org (hereinafter "Suspect Craigslist Email"). The Attleboro subject engaged in the following conversation with the person using
 the Suspect Craigslist E-mail:
 - Attleboro subject: My kids are older now, but i loved sniffing an tasting their panties abd underware. I would jo with them and in them it was so hot!!!
 - Suspect Craigslist E-mail: OH that is so hot! I like that a LOT. How old were they when you first started sniffing their panties? You notice a change in scent or what they left in the crotch as they got older? You ever get a peek at what they covered with those undies?
 - Attleboro subject: I started when they were 6. I noticied the difference over the year especially with daughter. From pee smell to full pussy. I peeked also and would immediately jo after.
 - Suspect Craigslist E-mail: I really like the look of hairless mounds and lips and those flat nips.
 - Attleboro subject: Me too i had my best cums looking at my daughter like that hairless and flat.

- Suspect Craigslist E-mail: Never had kids. Had some of my best cums looking at young neighbor and younger cousin. Those hairless mounds and lips were beautiful to look at a to kiss...always jerked off big loads in bathroom after looking at them.
- Attleboro subject: Mmmm i did the same after looking at my kids. Jerk so hard in my bed or vathroom. Cum so much. How u get to kiss the pussies?
- Suspect Craigslist E-mail: They were sleeping.
- Attleboro subject: Ive, done the same. They were sleeping. So hot and,tasty
- Suspect Craigslist E-mail: Oh yesss, those bald puffy lips looked sooo goodso inviting....begging to be kissed...always wanted to lick deep into the slit but afraid to wake them...settled for gentle kisses on mound and up and down slit...liked to do the same with nipples too
- Attleboro subject: I licked up and down. She slept so deep. I kissed and licked her nipples and when she was on her stomach i licked her asshole. Loved that!
- Suspect Craigslist E-mail: I wanted to see ass crack like that to try to kiss and lick it but both were back sleepers...always thought ti would be hot to lick their asshole....
- Attleboro subject: I loved licking her dirty asshole. I got the hardest doung that. Where are you?
- Suspect Craigslist E-mail: So fucking hot....I am west of Boston....Framingham area...you?
- Attleboro subject: Providence area
- 7. On March 13, 2017, HSI Providence executed a search warrant authorized by a magistrate judge for the District of Rhode Island requiring Craigslist to provide records associated with the Suspect Craigslist E-mail. In its response, Craigslist identified a Yahoo! account, walk2413@yahoo.com, as being associated with the Suspect Craigslist E-mail.
- 8. On March 31, 2017, HSI Providence executed a search warrant authorized by a magistrate judge for the District of Rhode Island requiring Yahoo! to provide records associated with the account walk2413@yahoo.com. On April 5, 2017, Yahoo! provided certain records in response to the warrant, which included the following registration information for the suspect Yahoo! account:

Registration date:

October 6, 1999

Full Name:

Mr Hungry Man

Address:

20 Burdette Ave. Framingham, MA 01702

Birthday: ·

(redacted), 1951

Phone:

(redacted)

9. Yahoo! also produced the Internet Protocol (IP) addresses for logins associated with walk2413@yahoo.com. Between the dates October 20, 2016 and March 31, 2017 the following IP address was associated with walk2413@yahoo.com account logins:

108.49.139.87

The Yahoo! search warrant response additionally included e-mail communications to and from *hungry mann* <*walk2413@yahoo.com*> ("hungry mann") from between May 2010 and March 31, 2017.

- 10. In an e-mail dated March 31, 2017 at 1:31 PM, an individual using the e-mail address (redacted) <(redacted)@gmail.com>2 sent hungry mann an e-mail containing one attachment:
 - a. index_008dasdw.jpg This image depicts a prepubescent female, between the approximate ages of three and five, with her eyes closed, holding an adult penis, and what appears to be semen on her face.

At 1:34 PM, hungry mann replied to the e-mail, stating:

"OH fucking unbelievably good....looks nice with cum all over her face...really like those nipples..."

¹ "Internet Protocol address" (IP address), as used herein, is a code made up of numbers separated by dots that identifies a particular computer on the Internet. Every computer requires an IP address to connect to the Internet. IP addresses can be dynamic, meaning that the ISP assigns a different unique number to a computer every time it accesses the Internet. IP addresses might also be static, if an ISP assigns a user's computer a particular IP address which is used each time the computer accesses the Internet.

² The email address is known to this affiant.

- 11. In an e-mail dated March 31, 2017 at 2:08 PM, (redacted) < (redacted) @gmail.com > sent hungry mann another e-mail, containing four attachments:
 - a. index_018acde.jpg This image depicts an infant female, shown naked from the waist down, with an adult penis ejaculating onto the infant's vagina.
 - index_021qd.jpg This image depicts a naked prepulsescent female laying on a
 bed with her legs spread apart and her hands on either side of her vagina.
 - c. 280.jpg This image depicts a prepubescent female laying on a bed, naked from the waist down except for white fishnet stockings, with her legs spread, exposing her vagina.
 - d. 3be6fcff-634a-4086-954c-8f673e4c20f4.jpg This image depicts a prepubescent female who is bent over at the waist, with her vagina exposed and an adult penis penetrating her buttocks.

Hungry mann replied to the e-mail at 2:16 PM, writing:

"OHHHHHHHHHHH!!! I can beat off to this all day...luv those bare little mounds and slits..thanks...will keep me cumming a few times today....will beat off to any you can send anytime"

- 12. On March 15, 2017, **hungry mann** communicated by e-mail with an anonymized craigslist e-mail address, (redacted)@reply.craigslist.org.³ At 2:13 PM, **hungry mann** sent the anonymized craigslist e-mail user a message containing two attachments:
 - a. 317_1000.jpg This image depicts a prepubescent female lying naked on a bed with her hand placed on her vagina.
 - 547_1000.jpg This image depicts a pubescent female, approximately between the
 ages of twelve and fourteen, standing and fully unclothed, exposing her pubic area.

³ The email address is known to law enforcement.

The anonymized craigslist e-mail user responded to **hungry mann** at 2:18 PM, "Daddy likes. My fav age". **Hungry mann** responded to the anonymized craigslist e-mail user: "That is so true..innocent and hairless and titlessI am ready to cum. Do you phone at all? If you can send #I could call and we could talk and cum."

- 13. On April 12, 2017, HSI Providence provided HSI Boston, Child Exploitation and Cyber Group, the Yahoo! search warrant response for *walk2413@yahoo.com*, including account registration information, IP logs, and e-mail communications.
 - a. According to publicly available records the address provided in the walk2413@yahoo.com registration records, 20 Burdette Ave. Framingham, MA (the SUBJECT PREMISES), is owned by Walter W. JOHNSON.
 - b. The IP address noted in Yahoo! IP logs, 108.49.139.87, resolves to MCI Communications Services, Inc., d/b/a Verizon Business. On April 12, 2017, HSI Boston served Verizon Internet Services, Inc. with a subpoena directing Verizon to provide subscriber information related to that IP address. In response, Verizon confirmed that the IP address resolves to an account in the name of Walter JOHNSON at the SUBJECT PREMISES.
 - c. According to commercial databases, the phone number provided in the Yahoo! registration records is listed to Walter JOHNSON.
- 14. On April 12, 2017, I reviewed the *hungry mann <walk2413@yahoo.com>* e-mail communications provided in the Yahoo! search warrant return for potentially identifying information about the e-mail user.
 - a. On March 28, 2017, hungry mann < walk2413@yahoo.com> received an e-mail from UMass Amherst Alumni Association with the subject line, "Join us for UMass Night at Fenway Park."

- b. On March 29, 2013, an e-mail with the subject "test" was sent from hungry mann <walk2413@yahoo.com> to wwJOHNSON@post.harvard.edu.
- c. Open source queries revealed that JOHNSON attended Harvard University as an undergraduate student and later attended a graduate program at UMass Amherst. JOHNSON went back to Harvard University in 1982 to work as a track coach, a position he held for 24 years before moving on to coach middle and high school students in Wellesley, Massachusetts.
- 15. Massachusetts Registry of Motor Vehicles records name Walter W. JOHNSON, with address 20 Burdette Avenue, Framingham, MA 01702, as the registered owner of a 2012 Honda Accord. JOHNSON resides at SUBJECT PREMISES with an adult female. Public records identified this woman as his girlfriend and as a third grade teacher for Framingham public schools.
- 16. On April 13, 2017, I conducted surveillance at the SUBJECT PREMISES. There were no vehicles present in the driveway. All but one of the wireless networks detected from my position outside of the residence were in a locked mode. The one unlocked wireless network was named "xfinitywifi," indicating the service is provided by an Internet Service Provider other than Verizon. Based on my training and experience, I know that persons often lock their wireless networks to prevent unauthorized users from accessing their wireless network. This also informs law enforcement that only limited users have access to the wireless network. In my experience, those accessing a locked wireless network are limited to occupants of the residence and persons known to and/or trusted by the occupants. In order for a user to gain access to a locked wireless network, the account owner must provide the user with a password. On April 20, 2017 at approximately 5:50 AM, I again conducted surveillance at the SUBJECT PREMISES. A vehicle bearing Massachusetts

- license plate 2WW425 and registered to Walter JOHNSON was observed parked at the end of the driveway.
- 17. Based on all of the foregoing information, this Court authorized search warrants, docketed as 17-MJ-2150-MBB and 17-MJ-2151-MBB, to search 20 Burdette Avenue, Framingham, MA 01702, and the person of Walter JOHNSON, for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A.

EXECUTION OF THE SEARCH WARRANTS

- 18. On April 27, 2017, HSI agents and Framingham Police officers executed the above-referenced search warrants. Walter JOHNSON was present at the time of execution, and agreed to be interviewed after he was advised of and waived his Miranda rights. The content of his statement, which was audio recorded, is summarized below.
- 19. JOHNSON advised agents that he is the user of three email accounts, including walk2413@yahoo.com. JOHNSON stated that he used Craigslist personal advertisements to meet other individuals, mostly men, with whom he would exchange sexually explicit stories and fantasies. JOHNSON stated that he had met other Craigslist users who sent him sexually explicit images of minors via email, as well as individuals to whom he sent sexually explicit images of minors. Agents asked JOHNSON if he could define "child pornography." JOHNSON described child pornography as "pictures of kids doing sexual things with adults." JOHNSON told agents he "used to" masturbate to the images of child pornography, and found the images sexually arousing.
- 20. During the course of his interview, JOHNSON told agents that his collection of child pornography was located on a thumbdrive inside a bedroom doorframe.
- 21. Computer Forensics Agents conducted a preview of JOHNSON's computer and media devices. The following images, referenced and described above, were located on a SanDisk thumbdrive that JOHNSON stated belonged to him:

- a. Paragraph 10a: index 008dasdw.jpg.
- b. Paragraph 11a: index 018acde.jpg.
- c. Paragraph 11b: index 021qd.jpg.
- d. Paragraph 11c: 280.jpg.
- e. Paragraph 11d: 3be6fcff-634a-4086-954c-8f673e4c20f4.jpg.
- f. Paragraph 12a: 317 1000.jpg.
- g. Paragraph 12b: 547 1000.jpg.
- 22. Additionally, computer forensics agents located examples of video files containing child pornography, including:
 - a. 20150930_132652_142978452284053.mp4 this 3:47 video depicts a prepubescent female wearing a mask but otherwise unclothed, shown masturbating and performing oral sex on an adult male, and the male later ejaculating onto her face.
 - b. Eb379092-1c41-43b9-b426-bc68eb2fbf8b-1.mp4 this 19-second video depicts a prepubescent female performing oral sex on an adult male.
 - c. 1c9c0e24-15b1-4401-a525-fb8f983fd485.mp4 this 52 second video depicts a pre-pubescent female holding a sign reading "I love Tin Tin" towards the camera, then fully undressing, dancing lasciviously and bending over, exposing her anus and vagina.

CONCLUSION

23. Based on the foregoing, I submit that there is probable cause to believe that on or about March 15, 2017, Walter JOHNSON knowingly distributed any child pornography that has been mailed, or using any means or facility of interstate commerce shipped or transported in or affecting interstate commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and on or about April 27, 2017, knowingly possessed any

material that contains an image of child pornography that has been transported using any means or facility of interstate commerce or in or affecting interstate or foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,

JANET CONNOLLY

Special Agent

Homeland Security Investigations

SUBSCRIBED and SWORN to before me on April 27, 2017.

HON TABLE MARIA SINE B. BOWLER UNITED STATES WE GISTIATE JUDGE

I previously reviewed the images referenced in paragraphs 10, 11, and 12 above, and found probable cause to believe that the referenced images depict minors engaged in sexually explicit conduct. I have reviewed portions of the videos referenced in paragraph 22 above, and find probable cause to believe that the referenced images depict minors engaged in sexually explicit conduct. The Affiant shall preserve said images for the duration of the pendency of this matter, including any relevant appeal process.

HONOKABLE MANDE B BOWLER UNITED STATES DATES TRATE JUDGE